

FILED

APR 20 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEREK D. BROWN,
EDWARD D. ROACH, and
AGNES T. COLLINS,

Defendants.

No. S1 4:21 CR 557 HEA

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about March 18, 2021, in St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, did intentionally forcibly assault, resist, oppose, impede, and interfere with Ryan Hanson, a Special Deputy United States Marshal, and the Defendant did so through the use of a deadly and dangerous weapon while Special Deputy Hanson was engaged in the performance of his official duties.

In violation of Title 18, United States Code, Section 111(a)(1) and punishable under Title 18, United States Code, Sections 111(a)(1) and 111(b).

COUNT TWO

The Grand Jury further charges that:

On or about March 18, 2021, in the St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, knowingly possessed, brandished, and discharged a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, assault on a federal officer, in violation of Title 18, United States Code, Sections 111(a)(1) and (b), as set forth in Count One.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT THREE

The Grand Jury further charges that:

On or about March 18, 2021, in St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, did intentionally forcibly assault, resist, oppose, impede, and interfere with Kyle Schreiber, a Special Federal Officer of the Federal Bureau of Investigation, and the Defendant did so through the use of a deadly and dangerous weapon while Special Federal Officer Schreiber was engaged in the performance of his official duties.

In violation of Title 18, United States Code, Section 111(a)(1) and punishable under Title 18, United States Code, Sections 111(a)(1) and 111(b).

COUNT FOUR

The Grand Jury further charges that:

On or about March 18, 2021, in the St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, knowingly possessed, brandished, and discharged a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, assault on a federal officer, in violation of Title 18, United States Code, Sections 111(a)(1) and (b), as set forth in Count Three.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT FIVE

The Grand Jury further charges that:

On or about March 18, 2021, in St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, did intentionally forcibly assault, resist, oppose, impede, and interfere with Gregory Benenati, a Special Deputy United States Marshal, and the Defendant did so through the use of a deadly and dangerous weapon while Special Federal Officer Schreiber was engaged in the performance of his official duties.

In violation of Title 18, United States Code, Section 111(a)(1) and punishable under Title 18, United States Code, Sections 111(a)(1) and 111(b).

COUNT SIX

The Grand Jury further charges that:

On or about March 18, 2021, in the St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, knowingly possessed, brandished, and discharged a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is,

assault on a federal officer, in violation of Title 18, United States Code, Sections 111(a)(1) and (b), as set forth in Count Five.

In violation of Title 18, United States Code, Sections 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT SEVEN

The Grand Jury further charges that:

On or about March 18, 2021, in St. Louis County, within the Eastern District of Missouri,

DEREK D. BROWN,

the Defendant herein, knowingly possessed a firearm, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHT

The Grand Jury further charges that:

On or about March 18, 2021, in St. Louis County, within the Eastern District of Missouri,

EDWARD D. ROACH,

the Defendant herein, knowingly possessed a firearm, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

The Grand Jury further charges that:

On or about March 18, 2021, in St. Louis County, within the Eastern District of Missouri,

AGNES T. COLLINS,

the Defendant herein, knowingly transferred and disposed of ammunition to Derek D. Brown, knowing and having reasonable cause to believe that Derek D. Brown had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year.

In violation of Title 18, United States Code, Section 922(d).

COUNT TEN

The Grand Jury further charges that:

On or about October 20, 2021, in St. Louis County, within the Eastern District of Missouri,

EDWARD D. ROACH,

the Defendant herein, knowingly possessed one or more firearms, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in the Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
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